

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.<sup>1</sup>

PROMESA Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

**INFORMATIVE MOTION OF ASSURED GUARANTY  
CORP. AND ASSURED GUARANTY MUNICIPAL CORP.  
REGARDING THE APRIL 28-29, 2021, OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (together, “Assured”) hereby submit this informative motion in compliance with the *Order Regarding Procedures for April 28-29, 2021, Omnibus Hearing* (ECF No. 16475)<sup>2</sup> and respectfully state as follows:

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> “ECF No.” refers to documents filed in Case No. 17-BK-3283-LTS, unless otherwise noted.

1. William J. Natbony and/or Casey J. Servais of Cadwalader, Wickersham & Taft LLP will speak on behalf of Assured at the April 28-29, 2021, Omnibus Hearing, which will be conducted telephonically via CourtSolutions due to the ongoing public health crisis.

2. Mr. Natbony and/or Mr. Servais may present oral argument on behalf of Assured related to the following:

(i) the *Motion of the Commonwealth of Puerto Rico, by and Through the Financial Oversight and Management Board, for Stay Relief Granting Leave to Prosecute Further Motions for Summary Judgment* (ECF No. 16326),<sup>3</sup> the accompanying memorandum of law (ECF No. 16327), and all related papers;

(ii) the *Debtors' Joint Motion for an Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, (III) Approving Form of Notice Thereof, (IV) Establishing Document Depository Procedures in Connection Therewith, and (V) Granting Related Relief* (ECF No. 16332)<sup>4</sup> and all related papers;

(iii) the *Official Committee of Unsecured Creditors' (I) Response to Motion of Commonwealth of Puerto Rico, By and Through Financial Oversight and Management Board, for Stay Relief Granting Leave to Prosecute Further Motions For Partial Summary Judgment, and (II) Urgent Cross-Motion For Stay Relief For Leave To File Limited Objection, Or In the Alternative, To Intervene* (ECF No. 16403)<sup>5</sup> and all related papers;

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<sup>3</sup> Assured filed a Reservation of Rights as ECF No. 16458.

<sup>4</sup> Assured filed a Reservation of Rights as ECF No. 16457.

<sup>5</sup> Assured file an Objection as ECF No. 16499.

(iv) the *Urgent Motion of Official Committee of Unsecured Creditors to Schedule Hearing on Renewed Motion of Official Committee of Unsecured Creditors Pursuant to Federal Rule of Bankruptcy Procedure 3013 for Entry of Order Reclassifying Class 48A and Class 55 Claims Under Oversight Board's Plan of Adjustment Dated March 8, 2021* (ECF No. 16397) and all related papers; and

(v) the *Government Parties' Motion for Order Allowing Administrative Expense Claim for Amounts to be Paid to LUMA Energy by PREPA During Interim Period Under Supplemental Agreement and the T&D Contract* (ECF No. 16241) and all related papers.

3. Mr. Natbony and/or Mr. Servais also reserve the right to be heard on any matter raised by any party at the April 28-29, 2021, Omnibus Hearing as concerns Assured related to the Title III Cases, or any adversary proceeding pending in the Title III Cases, or the interests of Assured.

*[Remainder of Page Intentionally Omitted]*

Dated: April 22, 2021  
New York, New York

**CASELLAS ALCOVER & BURGOS P.S.C.**

By: /s/ Heriberto Burgos Pérez

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By: /s/ Howard R. Hawkins, Jr.

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**CERTIFICATE OF SERVICE**

I hereby certify that I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the captioned case.

At New York, New York, the 22nd day of April, 2021.

By: /s/ Howard R. Hawkins, Jr.  
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\* Admitted pro hac vice